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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

**Case No. 3:07-cv-5944-SC  
MDL No. 1917**

This Document Relates to:

**DECLARATION OF GABRIEL A. FUENTES  
IN SUPPORT OF MITSUBISHI ELECTRIC  
DEFENDANTS' ADMINISTRATIVE MOTION  
TO FILE DOCUMENTS UNDER SEAL**

*Best Buy Co., Inc., et al. v. Technicolor SA,  
et al.*, No. 13-cv-05264;

*Electrograph Systems, Inc., et al. v.  
Technicolor SA, et al.*, No. 13-cv-05724;

*Interbond Corp. of Am. v. Technicolor SA,  
et al.*, No. 13-cv-05727;

*Office Depot, Inc. v. Technicolor SA, et al.*,  
No. 13-cv-05726;

*P.C. Richard & Son Long Island  
Corporation, et al. v. Technicolor SA, et al.*,  
No. 13-cv-05725;

DECLARATION OF GABRIEL A. FUENTES IN SUPPORT OF MITSUBISHI ELECTRIC DEFENDANTS'  
ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL

Case No. 3:07-cv-5944-SC; MDL No. 1917

1 *Target Corp. v. Technicolor SA, et al.*,  
2 No. 13-cv-05686;

3 *Costco Wholesale Corporation v.*  
4 *Technicolor SA, et al.*, No. 13-cv-05723;

5 *Schultze Agency Services, LLC v.*  
6 *Technicolor SA, Ltd., et al.*, No. 13-cv-  
05668;

7 *Sears, Roebuck and Co., et al. v.*  
8 *Technicolor SA*, No. 13-cv-05262;

9 *Dell Inc., et al. v. Phillips Electronics North*  
10 *America Corporation, et al.*, No. 13-cv-  
02171;

11 *Tech Data Corp., et al. v. Hitachi, Ltd., et*  
12 *al.*, No.13-cv-00157;

13 *Siegel v. Technicolor SA, et al.*, No.13-cv-  
05261;

14 *Viewsonic Corporation v. Chunghwa*  
15 *Picture Tubes Ltd., et al.*, No.13-cv-02510.

16  
17 **DECLARATION OF GABRIEL A. FUENTES**

18 I, Gabriel A. Fuentes, declare as follows:

19 1. I am an attorney licensed to practice law in the State of Illinois, and I am a Partner  
20 at the law firm of Jenner & Block LLP, and attorney of record for Defendants Mitsubishi Electric  
21 Corporation, Mitsubishi Electric US, Inc., and Mitsubishi Electric Visual Solutions America, Inc.  
22 (collectively, the “Mitsubishi Electric Defendants”). I submit this declaration in support of the  
23 Mitsubishi Electric Defendants’ Administrative Motion to File Documents Under Seal (the  
24 “Motion”). I have personal knowledge of the facts set forth in this declaration and, if called as a  
25 witness, I could and would testify competently to such facts under oath.  
26  
27

2. On June 18, 2008, this Court signed the stipulated Protective Order (Case No. 3:07-cv-05944-SC, Dkt. No. 306), that allows a party to designate a document or deposition testimony “Confidential” or “Highly Confidential” when that party believes the document or testimony contains “trade secrets, or other confidential research, development, or commercial information, within the meaning of Fed. R. Civ. P. 26(c); or other private or competitively sensitive information for which special protection from public disclosure and from use for any purpose other than prosecuting this litigation would be warranted.” *See id.* at 1-6.

3. When litigation materials are designated confidential pursuant to the Protective Order, “a Party may not file [them] in the public record.” “A party that seeks to file under seal any Protected Material must comply with Civil Local Rule 79-5.” *Id.* at 11.

4. Pursuant to Civil Local Rules 7-11 and 79-5, and the Stipulated Protective Order, the following should be maintained under seal: Exhibits 15-21 to the Declaration of Shaun M. Van Horn in Support of Defendants’ Reply in Support of Defendants’ Joint Motion for Summary Judgment Against ViewSonic Corporation Based Upon Failure to Provide Evidence to Avoid FTAIA Bar on Foreign Commerce and the redacted portions of the Reply are “Confidential” or “Highly Confidential” expert reports, deposition testimony, and other private or competitively sensitive information, designated as “Confidential” or “Highly Confidential” by ViewSonic Corporation pursuant to the Protective Order.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed this 23rd day of January, 2015 at Chicago, Illinois.

JENNER & BLOCK LLP

By: /s/ Gabriel A. Fuentes

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